ACTION BO

BENEDETTI, R.L BENJAMIN, A. BERMAN, H.S.

CARNIVAL, G.J. CORDOVA, R.C. CROUCHER, D.W.

DAVIS, J.G. FERRERA, D.W.

HANNI, B.J.

DIST.

States Government

Department of Energy

morandum

lim 25 3 05 Pil 'Rocky Flats Office

EGGG ROCKY FLAYS PLANT CORRESPONDLINGS GOVERNS

MAR 25 1993

ERD:SG:03637

Operable Unit 2 Subsurface IM/IRA and RFI/RI Report

Robert Benedetti, Associate General Manager Environmental Restoration Management EG&G Rocky Flats, Inc.

This memorandum concerns several items relative to the Operable Unit 2 Subsurface Interim Measure/Interim Remedial Action (IM/IRA) and the RCRA Facility Investigation/Remedial Investigation (RFI/RI).

RFI/RI Report

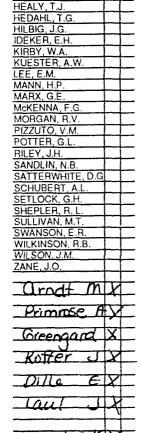
Technical Memorandum No 8, the revised Bedrock Work Plan is currently being reviewed by EPA and CDH. This document establishes the framework for the six "confirmation" well clusters in the Lower Hydrostratigraphic Unit. As discussed with your staff, we need to develop a "Contingency Plan" in case "significant" contamination is found. The "Contingency Plan" will need to detail what, if any, additional wells/boreholes and other steps will be taken if significant contamination is encountered. The Contingency Plan needs to be developed and approved by EPA/CDH, so that it can be implemented immediately rather than losing time coordinating with EPA/CDH after the fact. This is imperative because of the EPA/CDH decision to invoke stipulated penalties from March 12, 1993 until submittal of the Draft RFI/RI Report.

A preliminary Contingency Plan shall be developed and presented to EPA and CDH during the March 31, 1993, meeting. This preliminary Contingency Plan shall be presented to DOE March 30, 1993.

Subsurface IM/IRA

The February 11, 1993, letter from EPA indicated their concern that the Field Treatability Testing Unit (FTU) for the Surface Water IM/IRA be able to treat water from the vapor extraction testing. They indicated that this issue should be resolved as soon as possible. We suggest that this issue be addressed in the Draft and Final FTU Treatability Testing Reports due May 18 and July 13, 1993, respectively.

Discussions have occurred with the Office of Technology Development (EM-50) concerning funding the bench scale and pilot scale studies of mobilizing radionuclides and VOCs at Operable Unit 2 using Dynamic Steam Stripping/Electric Heating. EM-50 is close to approving FY93 funding to conduct the bench scale testing. We need



Reviewed for Addressee Corres, Control RFP

BY

CORRES CONTROL

TRAFFIC

Ref Ltr. #

DATE

25 **199**3

to develop a budget for a pilot demonstration (including monitoring/cross hole tomography costs) for FY94/95 that would include cost sharing between EM-50 and EM-40 funding. We must also develop a strategy for integrating the Subsurface IM/IRA and EM-50 projects.

Three-Dimensional (3D) modeling (Dynamic Graphics) of the hydro-geology at the three test sites shall be initiated in the near term. For Site 1, 3D modeling should be developed this spring/summer for the actual site of Test 1, including the soil gas survey information. 3D modeling will be included in the Test Reports. For Site 2, 3D modeling of the test site will need to be a part of the Draft and Final Test Plans. Please develop a schedule for implementation of 3D modeling for the Subsurface IM/IRA program. This should be insignificant to the existing Work Package because EG&G already has this software/hardware and you are preparing the Test Plans inhouse. Also, the modeling efforts can be combined with the modeling efforts associated with the RFI/RI and CMS/FS Report preparations. Please develop and submit a schedule for our review by April 12, 1993.

If you have any questions about this, please contact Scott Grace at extension 7199.

Assistant Manager for Transition and Environmental Restoration

cc:

A. Rampertaap, EM-453

P. Singh, ERD

M. Arndt, EG&G

A. Primrose, EG&G

T. Greengard, EG&G

J. Koffer, EG&G

E. Dille, EG&G

J. Laul, EG&G